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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MAC WILLIAM BISHOP and CHRISTOPHER CHIVERS,

Plaintiffs,

13 Civ. 8620 (GWG)

- against -

UNITED STATES DEPARTMENT OF HOMELAND SECURITY,

Defendant.

PLAINTIFFS' CROSS-MOTION FOR SUMMARY JUDGMENT

X

PLEASE TAKE NOTICE that, upon Plaintiffs' Memorandum of Law in Support of their Cross-Motion for Summary Judgment and in Opposition to Defendant's Motion for Summary Judgment; the Declaration of David E. McCraw, dated May 12, 2014; and all prior papers and proceedings in this action, Plaintiffs shall move this Court at such time and date as set by the Court for an order (i) granting Plaintiffs' cross-motion for summary judgment or, in the alternative, ordering *in camera* review of the documents at issue; (ii) awarding Plaintiffs the costs of this proceeding, including reasonable attorney's

fees, as expressly permitted by the Freedom of Information Act; and (iii) granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, by an Order of the Court, dated March 10, 2014, Defendant's responsive papers are to be served no later than June 9, 2014 and Plaintiffs' reply no later than June 16, 2014.

Dated: New York, NY May 12, 2014

Respectfully submitted,

David E. McCraw, Esq.

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DICLE

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(via ECF)